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13 *Toshiba America, Inc., Toshiba America*
14 *Information Systems, Inc., Toshiba America*
15 *Consumer Products, L.L.C., and Toshiba America*
16 *Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

22 This Document Relates to:
23 *All Indirect Purchaser Actions*

**DECLARATION OF
LUCIUS B. LAU IN SUPPORT OF
THE TOSHIBA DEFENDANTS'
MOTION TO STRIKE CLASS
REPRESENTATIVES WITH
INADEQUATE PROOF OF THEIR
INDIVIDUAL PURCHASES OF
TELEVISIONS OR MONITORS**

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DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE
TOSHIBA DEFENDANTS' MOTION TO STRIKE CLASS REPRESENTATIVES WITH
INADEQUATE PROOF OF THEIR INDIVIDUAL PURCHASES OF TELEVISIONS OR MONITORS

Case No. 07-5944-SC
MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic
5 Components, Inc. (collectively, the “Toshiba Defendants”).

6 2. I submit this declaration in support of the Toshiba Defendants’ Motion to
7 Strike Class Representatives with Inadequate Proof of Their Individual Purchases of
8 Televisions or Monitors, filed contemporaneously herewith. I have personal knowledge of
9 the facts stated herein, and I could and would competently testify thereto if called as a
10 witness.

11 3. Attached hereto as Exhibit A is a true and correct copy of excerpts from the
12 transcript of the deposition of Albert Sidney Crigler (Tennessee Class Representative), dated
13 October 23, 2012.

14 4. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
15 transcript of the deposition of Lisa Reynolds (Michigan Class Representative), dated April
16 13, 2012.

17 5. Attached hereto as Exhibit C is a true and correct copy of a carbon copy of a
18 check produced in this litigation by the Indirect Purchaser Plaintiffs bearing the Bates number
19 CRT000518, also marked and admitted as Exhibit 85 during the deposition of Lisa Reynolds
20 (Michigan Class Representative), dated April 13, 2012.

21 6. Attached hereto as Exhibit D is a true and correct copy of excerpts from the
22 transcript of the deposition of Brigid Terry (Wisconsin Class Representative), dated October
23 17, 2012.

24 7. Attached hereto as Exhibit E is a true and correct copy of Samsung Exhibits
25 A25, B25, D25, and E25, dated September 7, 2011, to the Indirect Purchaser Plaintiffs’
26 Amended and Supplemental Objections and Responses to Defendant Samsung SDI Co.,
27 Ltds.’s First Set of Interrogatories, dated August 31, 2011, also marked and admitted as
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1 Exhibit 425 during the deposition of Brigid Terry (Wisconsin Class Representative), dated
2 October 17, 2012.

3 8. Attached hereto as Exhibit F is a true and correct copy of excerpts from the
4 transcript of the Rule 30(b)(6) deposition of Lawyers' Choice Suites, Inc. (Alvin M.
5 Guttman) (District of Columbia Class Representative), dated October 11, 2012.

6 9. Attached hereto as Exhibit G is a true and correct copy of an order
7 confirmation produced in this litigation by the Indirect Purchaser Plaintiffs bearing the Bates
8 numbers CRT000907 through CRT000909, also marked and admitted as Exhibit 367 during
9 the Rule 30(b)(6) deposition of Lawyers' Choice Suites, Inc. (Alvin M. Guttman) (District of
10 Columbia Class Representative), dated October 11, 2012.

11 10. Attached hereto as Exhibit H is a true and correct copy of a shipping contents
12 list and shipping label produced in this litigation by the Indirect Purchaser Plaintiffs bearing
13 the Bates numbers CRT000910 through CRT000911, also marked and admitted as Exhibits
14 368 and 369 during the Rule 30(b)(6) deposition of Lawyers' Choice Suites, Inc. (Alvin M.
15 Guttman) (District of Columbia Class Representative), dated October 11, 2012.

16 11. Attached hereto as Exhibit I is a true and correct copy of excerpts from the
17 transcript of the deposition of Jeffrey Figone (California Class Representative), dated October
18 19, 2012.

19 12. Attached hereto as Exhibit J is a true and correct copy of excerpts from the
20 transcript of the deposition of Travis Burau (Iowa Class Representative), dated June 8, 2012.

21 13. Attached hereto as Exhibit K is a true and correct copy of excerpts from the
22 transcript of the deposition of David G. Norby (Minnesota Class Representative), dated
23 October 19, 2012.

24 14. Attached hereto as Exhibit L is a true and correct copy of excerpts from the
25 transcript of the deposition of Barry Kushner (Minnesota Class Representative), dated March
26 2, 2012.

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1 15. Attached hereto as Exhibit M is a true and correct copy of excerpts from the
2 transcript of the deposition of Charles Jenkins (Mississippi Class Representative), dated
3 November 14, 2012.

4 16. Attached hereto as Exhibit N is a true and correct copy of excerpts from the
5 transcript of the deposition of Gloria Comeaux (Nevada Class Representative), dated October
6 15, 2012.

7 17. Attached hereto as Exhibit O is a true and correct copy of excerpts from the
8 transcript of the deposition of Craig Stephenson (New Mexico Class Representative), dated
9 April 26, 2012.

10 18. Attached hereto as Exhibit P is a true and correct copy of excerpts from the
11 transcript of the deposition of Gary Hanson (North Dakota Class Representative), dated May
12 4, 2012.

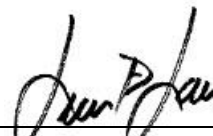
13 19. Attached hereto as Exhibit Q is a true and correct copy of excerpts from the
14 transcript of the deposition of Jeff Speaect (South Dakota Class Representative), dated
15 November 16, 2012.

16 20. Attached hereto as Exhibit R is a true and correct copy of excerpts from the
17 transcript of the deposition of Margaret Slagle (Vermont Class Representative), dated March
18 20, 2012.

19 I declare under penalty of perjury under the laws of the United States of America that
20 the foregoing is true and correct.

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23 Executed this 13th day of February, 2015, in Washington, D.C.

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Lucius B. Lau

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